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*United States Bankruptcy Counsel  
for Class Action Plaintiffs*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SINO-FOREST CORPORATION,

Debtor in a Foreign Proceeding

Chapter 15

Case No. 13-10361 (MG)

**DECLARATION OF MICHAEL S. ETKIN IN SUPPORT OF MOTION TO  
RECOGNIZE AND ENFORCE ORDER OF ONTARIO SUPERIOR COURT  
APPROVING DEALERS SETTLEMENT**

Michael S. Etkin hereby declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm of Lowenstein Sandler LLP, United States bankruptcy counsel to the Class Action Plaintiffs. I submit this declaration in support of the Class Action Plaintiffs' *Motion to Recognize and Enforce Order of Ontario Superior Court Approving Dealers Settlement* (the "Motion") filed contemporaneously herewith.<sup>1</sup>

2. Attached hereto are true and correct copies of each of the following documents:

Exhibit	Document
A	Settlement Approval Order
B	Minutes of Settlement – Dealers Settlement
C	Minutes of Settlement – Litigation Trust Settlement
D	Affidavit of Garth Myers Dated April 8, 2015
E	Supplemental Approval Notice
F	Supplemental Recognition Notice

<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed thereto in the Motion.

Exhibit	Document
G	Distribution Order
H	Canadian Fee Order
I	Document Production Order

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 6, 2015  
New York, New York

/s/ Michael S. Etkin

Michael S. Etkin